

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HALEY IP LLC,

Plaintiff,

vs.

BRIDGESTONE AMERICAS, INC., d/b/a  
AZUGA, INC.

Defendant.

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Civil Action No. 2:22-cv-00230-JRG-RSP

**DEFENDANT AZUGA, INC.'S INITIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), Azuga, Inc.'s ("Azuga"), by and through its counsel, hereby makes the following initial disclosures. Azuga reserves the right to rely on documents, witnesses, and information that are later discovered, later come to light as being material, or as otherwise allowed under applicable law. Discovery is ongoing and additional evidence, or its significance, may become apparent in discovery. Nothing in these disclosures waives any objection to the production or introduction of any document or evidence, including any objection on any privilege, the work product doctrine, relevance, or burden:

- (i) **the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

**RESPONSE:**

1. Plaintiff, including members and representatives
2. Representatives and employees of Defendants.
3. Any and all other persons with knowledge of or involvement with the development, use, and design of the alleged infringing product(s), who are unknown to Azuga at this time, regarding the circumstances surrounding the infringement claims.

4. All witnesses required for the authentication of documents and things later produced or discovered.
5. All witnesses identified by Plaintiff, Defendant, and any future party/non-party in this litigation.
6. Expert witnesses as may be necessary, who will be disclosed in accordance with the scheduling order governing this case.

Azuga expressly reserves the right to identify and to call as witnesses additional persons should it learn such additional persons have relevant knowledge during the course of discovery and investigation.

**(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

Azuga identifies the following documents in its possession, custody, or control, which it may use to support its defenses:

1. Relevant manuals, documents, and training materials in the possession of Azuga and/or third parties, including, but not limited to:

Azuga reserves the right to identify additional documents as discovery continues.

**(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Azuga does not claim damages.

**(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Azuga believes there are no applicable agreements.

Azuga will supplement these disclosures as discovery proceeds and per the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Matthew B. Brower

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**ATTORNEYS FOR DEFENDANTS**

**BRIDGESTONE AMERICA, INC. AND**

**AZUGA, INC.**

**CERTIFICATE OF SERVICE**

On the 6th day of January 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties pursuant to the Federal Rules of Civil Procedure.

/s/ Matthew B. Brower